

Exhibit A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

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ROBERT TOUSSIE,

Plaintiff,

SUMMONS WITH NOTICE

-against-

Index No.

WILLIAMS & CONNOLLY, LLP,
JOSEPH G. PETROSINELLI,
DAVID A. FORKNER,
JONATHAN E. PAHL,
LUPKIN & ASSOCIATES, PLLC,
JONATHAN D. LUPKIN,
REBECCA C. SMITHWICK,

Defendants.

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To the Person(s) Named as Defendant(s) Above:

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED to appear in this action by serving a notice of appearance on the Plaintiff(s) at the address set forth below within 20 days after the service of this Summons (not counting the day of service itself), or within 30 days after service is complete if the summons is not delivered personally to you within the State of New York.

YOU ARE HEREBY NOTIFIED THAT should you fail to answer or appear, a judgment will be entered against you by default for the relief demanded below.

Dated: July 16, 2020
Nesconset, New York


SCHEYER & STERN, LLC
By: Fredrick P. Stern, Esq.
Attorneys for Plaintiff
110 Lake Avenue So., Suite 46
Nesconset, NY 11767
(621) 265-8500

Defendant's Address:

WILLIAMS & CONNOLLY, LLP
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Washington, DC 20005

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LUPKIN & ASSOCIATES, PLLC
80 Broad St., Suite 1301
New York, NY 10004

JONATHAN D. LUPKIN
80 Broad St., Suite 1301
New York, NY 10004

REBECCA C. SMITHWICK,
1401 N. El Camino Real, Ste. 106
San Clemente, CA 92672

Notice: The nature of this action is:

The Plaintiff seeks compensatory damages for the Defendants' legal malpractice regarding their representation of the Plaintiff in the action entitled Robert Toussie, et al. v. Coastal Development, LLC, et al, in the Supreme Court of the State of New York, County of New York under Index No. 650227/2016. The Defendants' negligence included the failure to advise the Plaintiff that the entry of the Judgment in that action on July 17, 2017 would forfeit all of the Plaintiff's rights in a certain payment stream and that the Judgment would render Plaintiff's interest to that of a subordinate Judgment Creditor behind a secured creditor who claimed priority to all present and future assets of the Judgment Debtor rendering the Judgment obtained illusory.

The relief sought is: Compensatory and punitive damages, attorneys fees and costs.

Should Defendant(s) fail to appear herein, judgment will be entered by default for the sum of 7,857,642.50 with interest from the date of July 17, 2017 and the costs of this action.

Venue: Plaintiff(s) designate(s) Kings County as the place of trial. The basis of this designation is Plaintiff resides in Kings County.